

DENTAL BOARD OF CALIFORNIA
INITIAL STATEMENT OF REASONS

Hearing Date: August 20, 2004

Subject Matter of Proposed Regulations: Approval of Radiation Safety Approved Courses/Requirements for Radiation Safety Courses

Section (s) Affected: 1014 and 1014.1

Specific Purpose of each adoption, amendment, or repeal:

The proposed changes to Section 1014 and 1014.1 are to clarify and specify the requirements that Board-approved providers of radiation safety courses must meet, in order to assure that students are prepared to competently and safely expose dental x-rays on patients. The proposed changes are:

1014: Makes technical change to correct reference section.

1014.1:

- (a)(2) specify the student records that course providers must maintain, and for what period of time, to assure that the providers' compliance with the regulatory requirements can be ascertained by the Board.
- (a)(4) requires that the Social Security number of each student be transmitted to the Board, so that an accessible electronic record of the student's compliance can be maintained by the Board.
- (c)(1) and (c)(3) adds several categories of auxiliary personnel who are allowed to be faculty of the course, since there is no reason to limit faculty to dentists, registered dental assistants and registered dental hygienists.
- (c)(2) specify the requirement that faculty must meet, including licensure, experience, and completion of a two-hour teaching methodology course in clinical evaluation, to assure that faculty are competent to teach.
- (d) change the reference from "darkrooms" to "developing or processing facilities" in recognition of the emerging change to digital, rather than manually processed radiographs.
- (d) specify that disinfection and sterilization procedures specified by board regulations must be followed in order to be consistent with Section 1005 (Infection Control Guidelines).

- (e) like the regulations that govern educational programs for registered dental assistants (1070, 1070.1, 1070.2), specify required program content in terms of course outline, program and unit objectives, evaluation criteria, and areas of instruction, so that programs are consistent and can be objectively evaluated by the Board.
- (g) specify the student/teacher ratio for laboratory and clinical instruction, to assure that students have adequate access to individualized instruction.
- (g) specify the content of the clinical instruction, so that programs are consistent and can be objectively evaluated by the Board.
- (h) specify that outside clinical facilities are subject to the same requirements as internal clinical facilities for consistency.
- (i) specify that the course shall be no less than 32 hours, including at least 8 hours of didactic training, 12 hours of laboratory training, and 12 hours of clinical training, assure sufficient instruction hours, and so that programs are consistent and can be objectively evaluated by the Board.
- (j) specify that the certificate of completion must contain the number of course hours completed, so that courses can be audited for compliance with the required course length when certificates are submitted to the Board.

Factual Basis:

The current regulations: (1) do not address current technology; and (2) are not as clear and specific as is needed for consistency and objective evaluation of radiation safety programs by the Board.

Underlying Data

1. Title 16, CCR Sections 1070, 1070.1, and 1070.2 (Approval of Registered Dental Assistant Educational Programs)

Business Impact:

This regulation will not have a significant adverse economic impact on businesses.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Dental Board of California would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.